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**THE HONORABLE MARC BARRECA**  
**UNITED STATE BANKRUPTCY COURT**  
**FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

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| <b>IN RE:</b>  | <b>NO. 14-10421</b>   |
| <b>CASEY R. INGELS,</b><br><b>Debtor</b>   |   |
| <b>JOHN S. PETERSON, AS</b><br><b>BANKRUPTCY TRUSTEE,</b><br><b>Plaintiff,</b><br><b>v.</b><br><b>CASEY R. INGELS,</b><br><b>Defendants.</b> | <b>Adv. No.</b><br><br><b>COMPLAINT FOR ORDER DENYING</b><br><b>DISCHARGE</b> |

JOHN S. PETERSON, as Trustee, for his complaint against the above-named defendant,  
alleges as follows:

**JURISDICTION/VENUE**

1. This Court has jurisdiction over the matter(s) described herein as core proceeding(s)  
under 28 U.S.C. Section(s) 157(b)(2)(A) and (J), and under 28 USC Section 1334.
2. Venue for the action(s) set forth herein rest with the above-named Court under 28  
U.S.C. Section 1409(a), as action(s) related to the above-captioned bankruptcy case.

**PARTIES:**

3. The Plaintiff herein, JOHN S. PETERSON AS TRUSTEE ("plaintiff"), is the duly

**JOHN S. PETERSON**  
ATTORNEY AT LAW  
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Kingston, WA 98346  
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1 appointed, qualified and acting trustee in the above-captioned Chapter 7 bankruptcy case.

2 4. Defendants CASEY RAY INGELS is the debtor in the above-captioned case. The  
3 last known address of debtor-defendants provided by the defendants to the court is PO Box  
4 2242, Tacoma, WA 98401.

5 **SPECIFIC ALLEGATIONS:**

6 5. The above-captioned bankruptcy case was commenced on January 23, 2014, when  
7 the debtor filed his voluntary Chapter 7 petition with the above-named Bankruptcy Court.  
8

9 6. With the Chapter 7 petition, the debtor filed schedules of his assets and liabilities  
10 and a statement of financial affairs.

11 7. An examination of the debtor pursuant to 11 USC 341 was conducted March 11,  
12 2014.

13 8. During the examination, the debtor knowingly and fraudulently gave a false oath or  
14 account. Without limitation, the debtor/defendant made material mis-statements in the  
15 examination about the funding of the MJ Ray Ingels Family Irrevocable Trust, property at 9830  
16 Dekoven Dr. SW, Lakewood, Washington, transfers of the property to and from the trust and to  
17 MJB Consulting, LLC, and his knowledge of MJB Consulting, LLC.

18 9. The trustee reserves the right to amend this complaint in any respect as further  
19 information about the subject matter hereof may be obtained.  
20

21 Wherefore, plaintiff prays for an order of this Court, finding, determining and ordering  
22 as follows:

23 (a) entry of an order denying the debtor-defendants discharge in the bankruptcy case,  
24  
25

26 **JOHN S. PETERSON**

27 ATTORNEY AT LAW

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1 pursuant to 11 U.S.C. 727(a)(4)(A) and

2 (b) such other and further relief as the Court deems just and proper.

3 Dated this 29th day of September, 2014.

4 /s/ JOHN S. PETERSON

5 JOHN S. PETERSON

6 Trustee

7 WSBA # 13985

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Complaint  
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